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ATTACHMENT D

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of	)	
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Application by SBC Communications, Inc.	)	CC Docket
For Authorization Under Section 271 of the	)	No. 97-121
Communications Act To Provide In-Region	)	
InterLATA Service in the State of Oklahoma	)	
	)	

COMMENTS OF AT&T IN OPPOSITION TO SBC'S SECTION 271 APPLICATION FOR OKLAHOMA

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noted the need for a hearing on whether the rates were cost-based. Id. ¶ 18. Neither an arbitrator nor the State Commission has yet found that SBC's rates comply with these critical statutory requirements.

C. SBC Is Neither Providing Nor Offering Nondiscriminatory Access To Its Operations Support Systems.

Even if SBC were willing to provide everything else that the Act requires on fair and nondiscriminatory terms, the simple fact would remain that AT&T and other CLECs still lack the ability to order and provision services for customers though electronic interfaces with SBC's operations support systems ("OSS"). The importance of scrutinizing the extent to which CLECs are provided nondiscriminatory access to SBC's operations support systems cannot be overstated. As the Commission found in the Local Competition Order, "it is absolutely necessary for competitive carriers to have access to operations support systems functions in order to successfully enter the local service market." Order ¶ 521 (emphasis added).[14] And under Section 251(c)(3), an incumbent LEC must provide competitive carriers with electronic access to the incumbent's OSS that is at least "the same" as or "equal to" what it provides to itself. Order ¶¶ 518, 519, 523; see Pfau Aff. ¶ 10. Accordingly, the Commission ordered incumbent LECs to provide nondiscriminatory access by January 1, 1997. Order ¶¶ 316, 516-17, 525.

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[14] See also id. ¶ 522 ("operations support systems functions are essential to the ability of competitors to provide services in a fully competitive local service market"); id. ¶ 518 ("if competing carriers are unable to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself, competing carriers will be severely disadvantaged, if not precluded altogether, from fairly competing") (emphases added).

In its Second Order on Reconsideration, the Commission clarified that it would not take enforcement action against a non-complying LEC if, by January 1, 1997, the LEC had "establish[ed] and ma[de] known to requesting carriers the interface design specifications that the incumbent LEC will use to provide access to OSS functions." Second Order on Recons. ¶ 8 (CC Docket No. 96-98 (released Dec. 13, 1996)). The Commission reaffirmed, however, (1) that incumbent LECs must provide access to operations support systems on terms and conditions "equal to the terms and conditions on which an incumbent LEC provisions such elements to itself or its customers" (id. ¶ 9); (2) that the "actual provision" of such access "must be governed by an implementation schedule" (id. ¶ 8); and (3) that "incumbent LECs that do not provide access to OSS functions, in accordance with the *First Report and Order*, are not in full compliance with section 251." Id. ¶ 11 & n.32 (citing § 271(c)(2)(B)).

Given that SBC's implementation schedule extends far beyond this spring, the notion that SBC can claim today to have met its OSS obligations is absurd on its face. See Dalton Aff. ¶¶ 38, 51 & n.21, 64. Indeed, there are three fundamental deficiencies in SBC's OSS compliance to date.

1. UNE-Platform. First, by not yet providing AT&T with specifications for ordering combinations of unbundled elements, SBC has not complied even with the Commission's interim requirement that SBC "establish and make known" all interface specifications by January 1, 1997. Indeed, to achieve the kind of cooperative interconnection contemplated by the Act, it is inconceivable that an incumbent could provide even specifications without first discussing interface issues with all interested CLECs. Yet, despite repeated requests from AT&T beginning in June, 1996, and despite arbitration decisions in five states

(including Oklahoma), SBC has resisted making serious efforts to develop, let alone test, electronic interfaces for serving customers via the platform and other combinations of unbundled elements. Falcone/Turner Aff. ¶ 10; Dalton Aff. ¶¶ 38-43. SBC was willing to address only a limited form of the platform in negotiations (id. ¶¶ 40-42) and its conduct since then has fallen equally short of providing nondiscriminatory OSS access for ordering and provisioning UNEs.

2. Resale. Second, SBC has not shown and cannot show that its interfaces for resale are operationally ready. This is a stark failure, for SBC's resistance to competition via unbundled network elements has required AT&T to focus its initial market entry efforts on resale. Here, too, there have been delays. For example, it is increasingly clear that SBC will not meet the key target dates set forth in the implementation schedule for OSS interfaces adopted by the Oklahoma commission in the SBC-AT&T arbitration.[15] Nevertheless, AT&T expects to begin testing SBC's Datagate and EDI interfaces for pre-ordering and ordering, respectively, in Texas on May 20, 1997, and hopes to complete testing by August. Dalton Aff. ¶¶ 51 & n.21, 64.

Experience suggests, however, that the actual time that will be needed to get these interfaces operationally ready is uncertain. For example, SBC's merger partner, Pacific Telesis, led AT&T to believe months ago that its electronic interfaces were operationally ready and able to handle competitively significant volumes of orders on a nondiscriminatory basis. This proved to be untrue: Without first advising AT&T, Pacific Telesis resorted to manual processing of AT&T's orders. The backlog of pending AT&T orders eventually became so great that AT&T

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[15] Application of AT&T, No. PUD 960000218, Report and Recommendations pp. 6-7 (Nov. 13, 1996) and Order p. 4 (December 12, 1996); Dalton Aff. ¶¶ 51 & n.21, 64.

was compelled significantly to curtail its marketing efforts in California. Dalton Aff. ¶ 63. AT&T's experience with Pacific Telesis underscores that a BOC's mere assertion that its electronic interfaces will provide nondiscriminatory access cannot be accepted until experience proves that the assertion is true.

To accelerate market entry in Oklahoma, AT&T recently decided to test SBC's proprietary Consumer Easy Access Sales Environment ("C-EASE") system for pre-ordering, ordering, and provisioning resale service to residential customers. Even if the testing confirms that C-EASE works as promised, however, C-EASE is not an adequate substitute for the electronic interfaces with SBC's OSS that the Act requires. It is at best an interim solution that may enable AT&T to enter the residential market in a limited way before the Datagate and EDI interfaces are ready.

The limitations of C-EASE are inherent in its nature. C-EASE is not an interface that allows AT&T's systems to communicate with SBC's systems. Rather, C-EASE requires an AT&T service representative to act as an interface between the two systems, entering customer information first into the SBC system, and second into the AT&T system. This duplication of effort increases not only the time and cost of customer service but also the risk of error. Dalton Aff. ¶¶ 47-50, 53-60. Even for simple residential orders, C-EASE will not provide AT&T with access to SBC's OSS on terms and conditions "equal to the terms and conditions on which [SBC] provisions such elements to itself or its customers." Second Order on Recon. ¶ 9.

Moreover, C-EASE is limited to simple residential resale orders. It cannot be used to order unbundled network elements. Dalton Aff. ¶ 47. Even for resale, it cannot be used to submit supplemental orders, nor can it be used for "partial migrations," where a customer seeks

to move only some of its lines to a different carrier. Id. ¶ 54 & n.23. And SBC's counterpart system for business orders ("B-EASE"), which uses a different operating system, is so limited in its capabilities as to be unworkable even as an interim, stop-gap measure. Id. ¶¶ 50, 57-59. SBC's other resale interfaces (for repair, maintenance, and billing) also are not operationally ready. Id. ¶¶ 71-76.

3. Nondiscriminatory Performance. But even if all of SBC's electronic OSS interfaces were operationally ready, that alone would not demonstrate that SBC was providing AT&T and other CLECs with "nondiscriminatory access" as required by Section 251(c)(3). To make that showing, SBC must commit to a set of performance measures and produce data that demonstrate that the OSS access that CLECs are receiving is in fact equivalent in terms of availability, timeliness, accuracy, and completeness to the OSS access that SBC provides to its own customer representatives. Pfau Aff. ¶ 7.

Of course, SBC cannot begin to make the required showing at this time because no carrier is yet even being provided with electronic access. But SBC has refused even to commit to a meaningful measurement plan. Such a plan is essential to permit an objective and verifiable assessment in the future of any claim that SBC is providing CLECs with nondiscriminatory access. Id. ¶¶ 11-12.[16]

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[16] The general service quality objectives set by the Oklahoma Corporation Commission are no substitute for a measurement plan, because those objectives address only a limited range of services and establish outer limits on performance to avoid sanctions. Pfau Aff. ¶ 15. They do not provide the basis for the comparison that Section 251(c)(3) and the Commission's Local Competition Order requires, which is whether CLECs are receiving access that is at least "'the same'" as, or "'equal to,'" the OSS access that SBC provides to its own customer representatives. Id. ¶ 10 (citations omitted).

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AFFIDAVIT OF NANCY DALTON

ON BEHALF OF AT&T CORP.

AT&T EXHIBIT D

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AFFIDAVIT OF NANCY DALTON
ON BEHALF OF AT&T CORP.

I. INTRODUCTION AND QUALIFICATIONS

1. My name is Nancy Dalton. My business address is 5501 LBJ Freeway, Dallas, Texas. I am Southwest Region Business Planning Vice President for AT&T Corp. ("AT&T"). In this position, I have responsibility for business planning for local service market entry and for negotiations with incumbent Local Exchange Carriers ("LECs") to facilitate such market entry. I am the lead negotiator on behalf of AT&T with Southwestern Bell Telephone Company ("SWBT"), and I have overall management responsibility for the SWBT negotiations. Among the matters I have personally focused on in these negotiations is ensuring SWBT's provision to AT&T of reasonable and adequate electronic interfaces for Operations Support Systems ("OSS") throughout SWBT's five-state region.

2. I attended and graduated from the Burdett School, a business school in Boston, Massachusetts.

3. Since joining AT&T in 1984, I have held positions in Business Communications Services ("BCS"), with responsibility for handling customer inquiries (e.g.,

billing); BCS, with responsibility for developing customer service methods and procedures; Network Services, with responsibility as a project manager for AT&T network-related billing conversions required to convert specific functions from LECs to AT&T; Consumer Communications Services ("CCS"), with responsibility as a project manager for billing processes for AT&T calling-card and operator-handled calls (e.g., usage recording, rating, message processing, bill calculation, bill rendering, payment processing, customer service, collections, and journalization); CCS, with responsibility for the AT&T Baldridge Application research and site visit teams; and the Consumer Communications Local Services Organization, with responsibility for local market entry planning. In March 1996, I accepted my current position in the Local Services Organization, where I am responsible for Southwest Region business planning and negotiations.

4. I have testified on behalf of AT&T in recent local service arbitrations, as well as before the Oklahoma Corporation Commission ("Oklahoma commission") on April 15, 1997, regarding OSS issues in connection with SWBT's current application for Section 271 interLATA authority.

II. PURPOSE AND SUMMARY OF AFFIDAVIT

5. The purpose of this Affidavit is to discuss SWBT's assertion that it has met the requirements of Sections 251 and 271 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("Act"), with respect to OSS.

6. SWBT has failed to meet the statutory requirements for the provision of nondiscriminatory electronic access to its OSS, both as regards its existing interconnection agreements and negotiation of an interconnection agreement with AT&T, and as regards its

SGAT. As SWBT affiant Elizabeth Ham has acknowledged, SWBT is obligated to provide competitive local exchange carriers ("CLECs") with "at least equivalent electronic access" to its OSS.[1] This means that the OSS access provided to CLECs by SWBT must be at least "the same" as,[2] or "equal to,"[3] the OSS access that SWBT provides to its own customer service representatives in terms of timeliness, accuracy, and reliability. SWBT's failure to comply with these standards is very troubling, because proper implementation of nondiscriminatory OSS access is a key component of the ability of AT&T, or any other CLEC, to enter into a given local market in a manner that genuinely enables the CLEC to compete with the incumbent LEC. It is no exaggeration to say that electronic access to SWBT's OSS for pre-ordering, ordering, provisioning, repair and maintenance, and billing

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[1] Affidavit of Elizabeth A. Ham (Tab 7), ¶¶ 4-5, 59, quoting Second Order on Reconsideration, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (released December 13, 1996) ("Second Order on Recon."), ¶ 9.

[2] First Report and Order, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (released August 8, 1996) ("Local Competition Order"), ¶ 523 ("the incumbent must provide the same access to competing providers" that it provides to its own customer service representatives); ¶ 316 ("the incumbent must provide access to [OSS] functions under the same terms and conditions that they provide services to themselves or their customers"); ¶ 518 (competing providers must be provided with the ability "to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself") (emphasis added).

[3] See id., ¶ 519 (generally relying upon state commission orders "ordering incumbent LECs to provide interfaces for [OSS] access equal to that the incumbent provides itself"); ¶ 315 (access must be provided on terms that are "equal to the terms and conditions under which the incumbent LEC provisions such elements to itself"); Second Order on Recon., ¶ 9 (OSS access must be "at least equivalent" or "equal to" the access that the incumbent LEC provides to itself) (emphasis added).

functions at parity with SWBT will be a critical (if not the most critical) determinant of AT&T's and other new entrants' ability to provide effective local service competition.[4] This is because CLECs need these systems in order to ensure that customers obtain the services they want, when they want them, with the quality they demand, and with timely and accurate billing for the services provided. Customer satisfaction on such matters is particularly important to new entrants trying to convince customers that switching from SWBT to a different local carrier will not be a "hassle" and will provide an overall service experience at least as good as the customers now experience with SWBT.

7. SWBT's proposed OSS interfaces are not yet ready to support local service market entry at reasonable volume levels such as those planned by AT&T and, presumably, other large CLECs as well. SWBT thus far has not even reached the stage of offering any interface specifications that would make it feasible for AT&T to offer local service by means of the unbundled network element ("UNE") platform (i.e., the combination of all network elements required to provide local service to customers) that was specifically authorized in the Act.[5] Development of OSS interfaces for UNEs remains mired in the first

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[4] The Commission has found that nondiscriminatory access to OSS is "absolutely necessary" and indeed "critical." Local Competition Order, ¶ 521; Second Order on Recon., ¶ 11.

[5] Paragraph 251(c)(3) of the Act states: "An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service." This Commission's Local Competition Order further makes clear that incumbent LECs such as SWBT must provide unrestricted access to UNEs and combinations of UNEs. See Local Competition Order, ¶¶ 329, 331, 340, 536. As explained in the accompanying Affidavit of Robert Falcone and Steven Turner, the platform AT&T seeks to use would consist of the unbundled loop, network interconnect device, local switching, shared and dedicated transport, signaling and call-related databases, and tandem switching.

of seven necessary work stages, as discussed below. As described more fully in the accompanying Affidavit of Rian Wren, SWBT's failure to provide OSS access for the UNE platform is simply one aspect of its overall strategy of trying to discourage use of the platform at every turn.

8. SWBT also has not yet provided nondiscriminatory OSS access for resold services. As discussed in detail below, AT&T and SWBT have agreed to use a specific set of electronic interfaces in order to achieve nondiscriminatory OSS access, including DataGate for pre-ordering functions and Electronic Data Interchange ("EDI") for ordering and provisioning. However, SWBT will not have these interfaces available as agreed. Therefore, in order to avoid further delays before it can offer local exchange service to residential customers, AT&T has had to agree, as a temporary and inadequate alternative to such nondiscriminatory OSS access, to use certain proprietary SWBT systems -- such as the Consumer Easy Access Sales Environment ("C-EASE") system for pre-ordering, ordering, and provisioning -- to obtain limited access to essential OSS functions. However, these internal SWBT systems have inherent deficiencies such that they will not provide AT&T's customer service representatives with the same timeliness, accuracy, or reliability that SWBT's own representatives will receive. Moreover, as regards the interfaces that AT&T believes have the potential to provide parity OSS access -- and that SWBT has agreed to provide – key development issues are still being negotiated, and SWBT is still in the process of clarifying and supplementing its own interface specifications. Also, testing of the critical pre-ordering, ordering, and provisioning interfaces (including the stop-gap C-EASE system) has not been completed, and therefore AT&T cannot yet advise this Commission on

the adequacy of the test results. Once such results are obtained, SWBT and AT&T will need to work jointly to address any problems that are revealed, before these interfaces can be implemented in the marketplace. In sum, SWBT is far from being able to provide CLECs with reliable and nondiscriminatory electronic access to its OSS capabilities.

III. PROVISION OF OPERATIONS SUPPORT SYSTEMS IS NOT COMPLETE.

A. Full, Efficient, and Effective OSS Interfaces Are Essential To All CLECs Both For Resale And For The UNE Platform

9. Operations support systems are the computer-based systems and databases that telecommunications carriers use for a number of vital customer-oriented and business-support functions. These systems support a variety of carrier interactions with customers, including:

- pre-ordering activities, such as determining a customer's existing service, verifying the customer service address, determining services and features or UNEs available to the customer at that address, assigning telephone numbers, establishing a due date for service installation, scheduling a dispatch when necessary, and determining the long-distance carrier choices available for the customer's address;
- ordering activities, such as determining what services and features or UNEs a customer wants, understanding how the customer wants his or her directory listing to appear in the directory assistance bureaus and white pages, subscribing the customer to a long-distance carrier, and defining customer blocking requirements (e.g., 900, collect, etc.);

repair, and billing is misleading at best. AT&T is not intimately familiar with each and every interface that Ms. Ham discusses in her affidavit, partly because there are a number that SWBT has never mentioned during OSS negotiations between our two companies. In some cases, though, it appears from the affidavit that the capabilities of such interfaces are inferior to (or no better than) the capabilities of the alternative interfaces that AT&T and SWBT are already planning to implement -- which themselves have not yet been shown to satisfy the requirements of Sections 251 and 271 of the Act – or that they cannot handle large volumes of transactions.

46. In the interest of completeness, I will address at least briefly each interface identified by Ms. Ham as purportedly capable of providing nondiscriminatory OSS access. My main focus, however, will be on the specific interfaces that AT&T and SWBT currently plan to implement in order to provide AT&T with access (though not nondiscriminatory access) to OSS.

a. Pre-Ordering Interfaces

47. EASE. As noted above, AT&T has decided to use certain proprietary, internal SWBT systems, despite their inherent limitations and associated excess costs, to provide resold services to residential customers in order to ensure the earliest possible market entry. One of these systems is SWBT's Easy Access Sales Environment ("EASE").[19] AT&T is currently in the process of testing the operational functionality of one type of EASE

[19] AT&T initially informed SWBT on May 9, 1996 that, because of the inadequacies of the EASE interface, AT&T would not use it. AT&T subsequently notified SWBT on January 26, 1997 of its decision to use C-EASE on an interim basis.

interface, Consumer EASE ("C-EASE"), for pre-ordering activities in connection with resale of services to residential customers (as well as for ordering and provisioning for such residential resale customers, as discussed below). However, EASE will be used only on an interim basis because, as SWBT has acknowledged,[20] it is incapable of supporting the UNE platform (or even the ordering of individual UNEs, such as unbundled loops), and because, even for resale, EASE will not allow AT&T to serve business customers adequately and will require excessive manual intervention and redundant operations even where it can be used (i.e., for residential accounts).

48. SWBT's C-EASE system has such significant inherent shortcomings for pre-ordering that, if it is used for very long, AT&T or any other CLEC will be at a significant competitive disadvantage. AT&T's use of C-EASE on an interim basis for pre-ordering simply does not afford interfaces comparable to those used by SWBT's service representatives when they interact with SWBT's own retail customers. As illustrated in Attachment 18, because C-EASE is a proprietary SWBT system, it requires AT&T's service representatives to learn and use two different sets of screens when interfacing with customers, i.e., SWBT's C-EASE screens and AT&T's internal system screens. SWBT's customer service representatives, on the other hand, can use one process and one set of screens throughout the company to handle customer inquiries. Use of duplicate processes and screens will increase sales execution time as well as operating costs.

[20] See Ham Aff. Att. B at 1.

49. Because of the limitations, constraints, and duplicate or customized work efforts (e.g., use of multiple systems) that this will cause, C-EASE cannot provide nondiscriminatory access to SWBT's OSS pre-ordering functions. Rather, C-EASE will leave SWBT with a decided advantage in competing against AT&T and other CLECs for residential customers. SWBT's own customer-service representatives clearly will enjoy quicker and more reliable access to more complete customer information than AT&T's representatives will receive using C-EASE. Thus, C-EASE plainly does not meet the nondiscrimination requirements of Sections 251 and 271 for purposes of providing access to SWBT's OSS pre-ordering capabilities.

50. SWBT's Business EASE ("B-EASE") system is even more deficient than C-EASE for pre-ordering, to the point where it does not even provide AT&T with an interim solution to address the business market segments. In addition to the shortcomings and constraints described above for C-EASE, B-EASE has other limitations affecting pre-ordering as well. The B-EASE platform (unlike C-EASE, which is Windows-based) uses an OS-2 operating system and will therefore require CLECs such as AT&T to use two terminals (as opposed to the split-screen arrangement for residential customers). Also, B-EASE is limited to Business POTS customers with fewer than 30 lines and does not support complex business services, e.g., PBX/DID trunks, ISDN, or Centrex. These limitations of B-EASE will create a significantly larger volume of manual processing of orders via fax in comparison to that in an EDI environment. EDI is designed to provide electronic processing capabilities for Business POTS with more than 30 lines and should also support electronic processing for PBX and DID trunk orders.

51. DataGate. As Ms. Ham states in her affidavit, AT&T has now begun testing SWBT's DataGate electronic gateway. Based on the results we have seen to date, our current plan is eventually to use DataGate for pre-ordering functions. Systems interface testing of the pre-ordering capabilities of DataGate for resale has been completed between AT&T and SWBT. However, we have not yet begun to conduct operational readiness testing of DataGate with SWBT under simulated production conditions. Such testing, which is essential for determining whether DataGate can actually provide parity OSS access in terms of timeliness, accuracy, and reliability, is scheduled to start in Texas on May 20, 1997, and our goal is to complete this key phase within a period of approximately two to three months.[21]

52. Verigate. We are less familiar with SWBT's Verigate interface than with either EASE or DataGate, mainly because SWBT has never suggested to us that Verigate can provide parity access to SWBT's pre-ordering functions. To the best of my knowledge, the first we were aware of Verigate was when we saw it mentioned in SWBT's Oklahoma SGAT filing this past January. SWBT has never proposed that we test Verigate or offered to

[21] Operational readiness testing of DataGate is planned in conjunction with ORT for the EDI and CNA interfaces, discussed below. This integrated end-to-end testing will involve, in addition to pre-ordering activities, the ordering and provisioning of services; customer billing (30 days after initial order); receipt, processing, and application of bill payments; and simulated repair, maintenance, and collections scenarios. AT&T and SWBT will test first in Texas because that is the only state where AT&T has an approved interconnection agreement with SWBT. The time needed subsequently to test in Oklahoma will, of course, depend in part on the number and types of problems identified from the tests in Texas. Moreover, even if the Texas tests go smoothly in certain respects, it is impossible to be sure that the same positive results will later hold in Oklahoma, because Oklahoma-specific conditions may give rise to new problems.

demonstrate it to us. Our understanding, though, is that Verigate cannot provide any pre-ordering capability that is not obtainable via EASE or DataGate (and may be less flexible than DataGate in terms of the screens that CLECs are able to use). This appears to be corroborated by Ms. Ham's statement that Verigate "was designed for CLECs that do not want to use EASE or to pursue development of their own graphic user interface, and are not ready to use DataGate."[22]

b. Ordering and Provisioning Interfaces

53. EASE. As noted above in connection with pre-ordering activities, although AT&T has also decided to use the C-EASE interface on an interim basis for ordering and provisioning for residential resale customers, EASE has a number of serious deficiencies that prevent it from serving as a means to provide CLECs with nondiscriminatory access to those OSS functions as well.

54. C-EASE is not connected with AT&T's downstream systems as it is with SWBT's downstream systems. As an order is processed through C-EASE in SWBT, pertinent information is distributed automatically to the appropriate downstream SWBT customer account and billing systems. In addition, SWBT's customer service representatives can use one process and one set of systems, terminals, and screens throughout the company to handle customer orders. By contrast, AT&T's customer service representatives will be required to process some transactions through C-EASE, others (i.e., supplemental orders) through SWBT's separate Service Order Retrieval and Distribution ("SORD") system, and

[22] Ham Aff. ¶ 23.

still others (i.e., partial migrations)[23] manually based on fax transmittals. Use of multiple system screens as well as multiple processes for handling of orders (i.e., EASE vs. SORD vs. fax) will create the need for specialized training and complex methods and procedures, and it is sure to lengthen the time a service representative spends making processing decisions, hence taking away from the time available to spend with customers.

55. Likewise, using C-EASE will force AT&T's customer service representatives to perform dual entry of customer-order information both into C-EASE and into AT&T's own ordering system, so that AT&T's customer account information can be stored and fed downstream to billing systems. This would not be the case if SWBT were offering a true electronic ordering and provisioning interface that would allow AT&T's OSS and SWBT's OSS to "talk" to one another electronically, without AT&T's service representative acting as a go-between. Dual entry increases the time to complete an order, thus increasing AT&T's sales execution times as well as costs (also because development is required to implement a split-screen for use by AT&T's customer service representatives).[24] In addition, it increases the potential for errors. These problems are underscored by the need for AT&T, in order to use C-EASE, to develop methods and procedures for use of dual systems by its customer service representatives.

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[23] "Partial migrations" are instances where customers choose to move some but not all of their lines associated with a given account from one carrier to another.

[24] AT&T has analyzed the possibility of using a technique known as "screen scraping," which is designed to move information from one screen to another, as an alternative to dual entry. However, we have concluded that the new and unproven "screen scraping" technology is, at this point, no better an option for the situation we are facing with SWBT than having service representatives perform dual entry.

56. Using C-EASE also will make it more difficult for AT&T to track pending orders and follow through on questions or problems. C-EASE will not allow AT&T to receive firm order confirmations or order completion notices electronically for particular orders. Instead, AT&T each day will receive a batch file, which it will then have to download and match against its own order records. Once again, this means increased manual intervention, time spent, potential for error, and cost.

57. As for B-EASE, as noted above, its use is limited to Business POTS customers with fewer than 30 lines and does not support complex business services. This has significant ramifications for ordering activities. As Ms. Ham concedes in her affidavit, SWBT currently has no electronic means to receive and process service requests for business accounts involving more than 30 lines and/or certain complex serving arrangements (e.g., multiline hunting, trunk groups, or DID trunks). Instead, CLECs must submit such requests by phone or fax to SWBT's Local Service Provider Service Center ("LSPSC"), whereupon SWBT will rely on "extensive manual coordination" to handle them.[25]

58. With respect to the processing of large, complex business orders. SWBT has contended that SWBT itself handles such orders manually and that manual processing for CLECs therefore achieves parity treatment. I do not agree. For AT&T, additional manual processing and delay are introduced because two service representatives (one from AT&T and one from SWBT) are needed to write, input, fax, and re-input each order. Multiple personnel and multiple manual entries are not inherent in the SWBT environment. Further,

[25] Ham Aff. ¶ 35.

based on AT&T's experience as a fledgling CLEC during the Rochester trial, it is clear that being dependent on an incumbent LEC's manual processes (e.g., fax machines) can routinely cause problems such as orders being lost or otherwise mishandled.

59. Finally, EASE's lack of partial migration capability is especially detrimental in the business market segments, where (as industry experience with long-distance services teaches) it is more likely that customers will choose to buy services from multiple carriers.

60. In short, SWBT cannot possibly claim that providing EASE to AT&T or other CLECs affords parity OSS access for purposes of ordering and provisioning.

61. EDI. AT&T's current plan is to use SWBT's EDI gateway to access ordering and provisioning functions for resale business customers, based on our understanding of the capabilities that EDI should ultimately be able to provide. However, critical joint testing has not even begun. As Ms. Ham correctly states, "the EDI ordering processes are a new development to support an extremely complex task."[26] Use of EDI for ordering and provisioning involves extensive mapping and editing of information on both sides of the interface. Among other things, this means that, for EDI to function properly, numerous data fields must be populated in a manner that is consistent with SWBT's business rules. Because of the complexities inherent in the systems and business rules, there are many possible circumstances that can result in orders being rejected, status reports not being

[26] Ham Aff. ¶ 29.